

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP  
and LEADENHALL LIFE INSURANCE  
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

vs.

JOSH WANDER, STEVEN PASKO,  
KENNETH KING, 777 PARTNERS LLC,  
600 PARTNERS LLC, SPLCSS III LLC,  
SIGNAL SML 4 LLC, INSURETY AGENCY  
SERVICES LLC, DORCHESTER  
RECEIVABLES II LLC, SUTTONPARK  
CAPITAL LLC, SIGNAL MEDICAL  
RECEIVABLES LLC, INSURETY CAPITAL  
LLC, SUTTONPARK SERVICING LLC,  
SIGNAL SERVICING LLC, INSURETY  
SERVICING LLC, and ADVANTAGE  
CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453 (JGK)

Notice of Motion

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Defendant Josh Wander will move this Court, before the Honorable John G. Koeltl, at the United States Court House, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an Order (i) pursuant to Federal Rule of Civil Procedure 12(b)(2), to dismiss the complaint for lack of personal jurisdiction, (ii) pursuant to Federal Rule of Civil Procedure 12(b)(1), to dismiss the complaint for lack of subject matter jurisdiction, (iii) pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the complaint for failure to state a claim, and (iv) granting such other and further relief as the Court deems just and proper, including costs and disbursements.

Dated: New York, New York  
August 9, 2024

KRAMER LEVIN NAFTALIS & FRANKEL LLP

By: /s/ Jordan Estes

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